

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH DAKOTA  
WESTERN DIVISION

MARTY NOBLE and HOLLI TELFORD,	)	Case No. 5:17-cv-5088
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	<b>MOTION FOR ENLARGEMENT OF</b>
AMERICAN NATIONAL PROPERTY &	)	<b>TIME</b>
CASUALTY INSURANCE CO.,	)	
BOARDWALK PROPERTY MANAGEMENT	)	
CO., KEVIN WEST, LEHI OASIS, LLC,	)	
DAVID L. PARKER, AUSTIN B. CALES,	)	
JARED ELDRIGE in his official capacity,	)	
LARRY DEITER in his official capacity as	)	
Director for the Division of Insurance for the	)	
State of South Dakota, ROBERT J. POULSEN	)	
and POULSEN & SKOUSEN,	)	
	)	
Defendants.	)	

COME NOW Defendants Broadway Property Management Company, Robert J. Poulsen, and Poulsen & Skousen, by and through Rebecca L. Mann of Gunderson, Palmer, Nelson & Ashmore, LLP, their attorneys, and move the Court for a 21-day enlargement of time in which to answer or to otherwise respond to Plaintiffs' Amended Complaint pursuant to Fed. R. Civ. P. 6(b)(1). This is the first request for an enlargement of time.

Plaintiffs filed their original Complaint on November 17, 2017, and purportedly served Broadway Property Management Company, Robert J. Poulsen, and Poulsen & Skousen on November 27 or 28, 2017, resulting in a response due on December 18 or 19, 2017 pursuant to Fed. R. Civ. P. 12(a)(1)(A)(i). Plaintiffs filed an Amended Complaint on December 4, 2017 and pursuant to Fed. R. Civ. P. 15(a)(3), a "response to an amended pleading must be made within the time remaining to respond to the original pleading or within 14 days after service of the amended pleading, whichever is later." It is unclear if Plaintiffs ever served the Amended Complaint, but 14 days from the filing

date of December 4, 2017 is also December 18, 2017. Boardwalk Property Management Company, Robert J. Poulsen, and Poulsen & Skousen request a 21-day enlargement of time to answer or otherwise respond to the Amended Complaint, which is **January 08, 2018**.

Good cause exists because these Defendants are all located in Utah and just secured South Dakota counsel on December 14, 2017.

Dated: December 16, 2017.

GUNDERSON, PALMER, NELSON  
& ASHMORE, LLP

By: /s/ Rebecca L. Mann  
Rebecca L. Mann  
*Attorneys for Defendants Boardwalk Property  
Management Co., Robert J. Poulsen and Poulsen  
& Skousen*  
506 Sixth Street  
P.O. Box 8045  
Rapid City, SD 57709  
Telephone: (605) 342-1078  
Telefax: (605) 342-9503  
E-mail: rmann@gpna.com

**CERTIFICATE OF SERVICE**

I hereby certify on December 16, 2017, a true and correct copy of **MOTION FOR ENLARGEMENT OF TIME** was served electronically through the CM/ECF system on the following:

**Holli Telford**  
885 US Hwy 385  
Oelrichs, SD 57763  
Email: [hollietelford.1@gmail.com](mailto:hollietelford.1@gmail.com)  
*Pro Se*

**Richard M. Williams**  
Attorney General of South Dakota  
1302 E. Highway 14, Suite 1  
Pierre, SD 57501-8501  
Email: [rich.williams@state.sd.us](mailto:rich.williams@state.sd.us)  
*Attorneys for Jared Eldrige*

**Darin B. Goff**  
Assistant Utah Attorney General  
Utah Office of Attorney General  
160 E. 300 S. Sixth Floor  
P.O. Box 140856  
Salt Lake City, UT 84114-0856  
Email: [dgoff@agutah.gov](mailto:dgoff@agutah.gov)  
*Attorneys for Jared Eldrige*

And on December 18, 2017 served via U.S. Mail, first class, postage prepaid upon the following:

**Marty Noble**  
885 US HWY 385  
Oelrichs, SD 57763  
*Pro Se*

By: /s/ Rebecca L. Mann  
Rebecca L. Mann